Attachment G

FEDERAL PUBLIC SERVICE
MINISTRY OF AGRICULTURE AND SUPPLY – MA
DEPARTMENT OF FARMING AND CATTLE
INSPECTION OF PRODUCTS OF ANIMAL ORIGIN
DIVISION OF INTERNATIONAL COMMERCE CONTROL

Document no. 114/2002/DCI/DIPOA Brasilia, March 13, 2002

From: Director, International Control Division - DCI,
From the Department of Inspection of Products of Animal Origin - DIPOA

To: SIPAs Directors, for FSISs accredited for export into the USA.

Subject: Visit of the Veterinary Mission of the United States of America to Brazilian industries.

We are sending herewith the observations made by the Veterinary Mission of the United States of America, represented by Dr. Faizur Choudry, of FSIS/USDA, in January 2002.

General observations:

- Covering of all door cracks and gaps and other places of indoor access;
- Improvement of sanitation of utensils used in the industry;
- In can incubation rooms, thermometers and temperature sensors must be placed at average shelf height in order for temperature readings to be reflective of the full environment;
- Lighting of inspection areas and CCPs must be at least 540 lux;
- Preventive measures must be implemented in order to keep insects out of all plant indoor areas;
- The problem of condensation in chambers is considered critical by the USA, what could result in withholding or removal from list of exporters. Consequently, all efforts should be made to avoid that such situation occurs;
- All sterilizers must be designed so that the junction knife/cable remains submersed;

PPHO

- PPHO plan must include pre-operational and operational descriptions regarding **cleaning and sanitation** practices of the establishment and equipment in general;
- Monitoring of pre-operational activities must be performed prior to the start of those activities with enough time in advance so that adequate corrective actions may be implemented and that the

Federal Inspection Service may check and approve the pertinent activity;

- Good Production Practices must describe all procedures pertaining to the activities performed in the establishment, separately from PPHO;
- Implementation of preventive measures in the pre-operational and operational stages;
- Irregularities observed on the check-list must be clearly marked as acceptable or not acceptable;
- Those corrective actions implemented must be described in detail and be inserted in the same record card where noncompliances are classified;
- Pre-operational and operational procedures must be described in separate within the Standard Procedure for Operational Sanitation (PPHO);
- The PPHO must indicate who is responsible for overseeing the described procedures (obs: it is not necessary that the employee's name be mentioned, only his position and/or sector);
- Monitoring of pre-operational activities must be performed prior to the start of those activities with enough time in advance so that adequate corrective actions may be implemented and that the Federal Inspection Service may check and approve the pertinent activity;
- Pre-operational descriptions regarding cleaning and sanitation practices regarding equipment and tables;
- Irregularities observed must be described in detail and correctly identified (ex: dirt is a generic word, the type of dirt must be specified).

HACCP:

- During risk analysis, when a CCP is determined, it must be considered that biologic, physical and chemical risks must be taken into consideration because there are preventive and corrective actions specific for each risk in consideration and must be clearly considered CCPs;
- The HACCP plan must be described in detail, and must be written in a manner that anyone who reads the narrative may be able to clearly visualize it;
- All procedures described in the HACCP plan must be faithfully performed by the establishment. The discrepancy between the procedures described in the plan and their performance by the industry is considered a serious failure (ex: corrective/preventive measures in loco performed differently than those described in the plan);
- The flow-chart and HACCP risk analysis must include the primary and secondary packaging and additives;

- Corrective and preventive measures must be clearly identified for each CCP (physical, chemical and biological);
- Each step of the process must be analyzed for PC and CCP identification, which must be duly justified through regulations, scientific literature, etc.;
- Corrective actions must be followed by preventive measures in order to avoid recurrence of noncompliance;
- The frequency of checking procedures as described in the plan must be specified;
- Checking procedures must focus on three factors: calibration of all equipment used in monitor procedures, direct observation of monitoring activities and corrective actions, and record review. Direct measuring should also be used for checking monitoring procedures;
- When sampling is used to monitor a specific CCP, the corrective actions used for each unit not checked during the period of time between monitoring activities if a critical deviation is detected during monitoring must be recorded;
- The monitoring record card must include a section for the individual record of each unit under monitoring;
- The critical limit may not be established by a break;
- The HACCP Plan must indicate who is responsible for overseeing the described procedures (obs: it is not necessary that the employee's name be mentioned, only his position and/or sector);
- Only those items classified in the risk analysis as hazard to public health must be listed as CCPs;
- In case of deviation from a critical limit, monitoring frequency must be increased until control of the situation in question has been reestablished;
- Thermometers must be identified with numbers for checking control;

Pre-shipment review:

- Prior to product shipment into the USA, all CCPs monitoring records must be reviewed by Quality Control in order to ensure critical limits control;
- As directed by the U.S. Veterinary Mission, review must be performed immediately prior to issuing the International Sanitation Certificate, focusing on merchandise production dates to be shipped on that date. Daily CCP review is not acceptable to comply with pre-shipment procedures;
- CCP pre-shipment review must generate a specific record, initialed by Quality Control. Occasionally, Federal Inspection must review records prior to issuing the International Sanitation Certificate;

- The pre-shipment review mentioned in this paragraph applies only to CCPs, and doesn't involve other controls already routinely performed during product shipment;
- Pre-shipment control must be clear and must include corrective actions whenever necessary;

Federal Inspection (Information limited to FSIS):

- FSIS must keep inventory and daily control of release of the official stamps used in the several establishment sectors, by number and type (in use, outdated, new, etc.). Stamps must be kept in a cabinet at the IF main office under FSIS veterinary surveillance, in order to ensure stamp access to be controlled and inviolable, by means of sealing-wax, locker with code or any other means;
- Any time FSIS controls find any serious or mild irregularity relapses, a letter must be immediately sent to the establishment supervisor in order for the situation to be corrected;
- All irregularities observed regarding PPHO compliance must be recorded in detail;
- Pathogen reduction program regarding *Salmonella*:
  - FSIS will be responsible for supervision or sample collection, preparation and shipment, as well as for the results;
  - This is an official program, and must be kept in the Inspection main office;
  - In case of positive results, all actions must be implemented according to the instructions received by Circular-letter 113/2002/DCI/DIPOA.

We would like to request that all FSISs accredited for export into the Unites States of America be attentive and adopt preventive/corrective actions regarding irregularities and observations reported by the U.S. Mission.

Sincerely,

Marcelo Vieira Mazzini

Copy for: SIPAs/DFAs; SVAs/DFAs at international borders (ports, airports and border stations); DPB/MRE; ABIEC

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